

**REMARKS**

Claims 1-43, all the claims pending in the application, are rejected. Claims 17, 18, 23, 25, 27, 29 and 37 are amended. Claims 1-16, 30-36 and 38-43 are cancelled. New claims 44-54 are added.

**Support for Amendments**

The claims have been amended generally in accordance with the article 34 amended claims of international patent application PCT/SG04/00250, of which the present application is the US national phase application. Applicants note that the Article 34 amended claims were not considered by the Examiner in the first office action and many of the objections are not relevant to these claims. Applicants respectfully request the Examiner to advise why the Article 34 claims were not examined and the remedies that are available.

In order to enter the claims as amended under Article 34 at this stage, claims 1-16, 30-36 and 38-43 have been deleted, new claims 44-54 have been added, and the remaining claims amended based on Article 34 amended claims filed during international phase prosecution. The claims have been further amended to address the Examiner's clarity objections.

The new claim set includes independent claims 17, 25, 29 and 51. The remaining claims are all dependent claims, each appended to one of claims 17, 25, 29 and 51.

**Embodiments of the Invention and Amended Claims**

In embodiments of the present invention, a customer uses their communication device to pay for goods or services. For example, using the embodiments defined in claims 17 and 29, a customer can use their mobile phone at a retail outlet to pay for goods and services. In another example, in the embodiments defined in claims 25 and 51 the user can use their mobile phone to pay for goods purchased on-line and collected from a retail outlet.

The claims define the architecture for a retailer's system which includes at least one receiver processor located at a retail outlet and a retailer processor, and connection of the retailer's system with a central facility. The defined architecture is adapted to enable efficient

approval and communication of payment for goods and services where a user initiates the transaction from their communication device.

**Embodiment 1**

Embodiment 1 enables a customer to pay for goods or services at a retail outlet using a communication device. This embodiment is shown in Figure 1 and described in paragraphs 71 to 89 and defined in claims 17 and 29.

**Amended Claim 17**

Claim 17 is based on original claim 17 and defines a system of the kind described with reference to Figure 1 in paragraphs 71 to 89. Independent method claim 29 has been amended to define a method executed using the system of Figure 1 and as defined in claim 17.

Independent claim 17 defines:

*A payment transaction system comprising:*

*At least one receiver processor each receiver processor being located at a retail outlet, and each receiver processor having*

*a receiver adapted to receive payment data from a communication device belonging to a consumer to enable payment to be made for goods or services,*

*an EPOS terminal coupled to the receiver, and*

*a store back office server having a store database, the store back office server being connected to the EPOS terminal;*

*a retailer processor having a communication transmission processor and a transaction payment database;*

*a first communication link connecting each receiver processor to the retailer processor;*

*a central facility having a payment approval processor and an account transaction payment database, the account transaction payment database maintaining a database of accounts relating to consumers, and the payment approval processor adapted to interrogate the database and determine whether a payment is to be approved or declined;*

*a second communication link for connecting the retailer processor to the central facility so that the payment data can be transmitted from the retailer processor to the*

*payment approval processor, and for transmitting a signal back from the central facility to the retailer processor indicating that payment is approved to enable updating of the transaction payment database;*

*a third communication link for connecting the central facility with each receiver processor for enabling an indication of the approval of the payment to be transmitted from the central facility to the receiver processor so that the EPOS terminal is provided with an indication that payment is approved to enable a consumer to receive the goods or services relating to the payment.*

**Amended Claim 29**

Independent claim 29 defines:

*A payment transaction method comprising:*

*receiving payment data to enable payment to be made for goods or services by a receiver processor having a receiver for receiving the payment data from a communication device belonging to a consumer, an EPOS terminal, and a store back office server having a store database;*

*providing the payment data by the receiver processor via a first communication link to a retailer processor having a communication transmission processor and a transaction payment database;*

*providing the payment data by the retailer processor to a central facility via a second communication link, the central facility having a payment approval processor and an account transaction payment database, the account transaction database maintaining a database of accounts relating to consumers;*

*interrogating the account transaction payment database by the payment approval processor and determining by the payment approval processor whether the payment is to be approved or declined;*

*transmitting a signal back from the central facility to the retail processor via the second communication link indicating that payment is approved;*

*updating the transaction payment database of the retail processor; and*

*transmitting an indication of approval of the payment from the central facility to the receiver processor via a third communication link for connecting the central facility*

*with the receiver processor so that the EPOS terminal is provided with an indication that the payment is approved to enable a consumer to receive the goods or services relating to the payment.*

**Dependent Claims 18-24 and 45-50**

Dependent claims 18-24 and 44 are appended to claim 17 and add limitations of preferred embodiments. Dependent claims 45-50 are appended to claim 29 and add limitations of preferred embodiments.

In the embodiment defined in claim 17 and claim 29 payment data is received by a receiver processor, provided at a retail outlet, from the users' communication device. The payment data is provided by the receiver processor to a retailer data processing system via a first communication link. The retailer processor transmits the payment data to a central facility which approves or declines the payment. The central facility transmits a signal back from the central facility to the retailer processor. The central facility also transmits an indication that the payment is approved to the receiver processor to enable to consumer to receive the goods or services relating to the payment.

Claims 17 and 29 both define an architecture which uses three communication links. The first communication link connects the receiver processor to the retailer processor. The second communication link connects the retailer processor to the central facility. The third communication link connects the central facility with the receiver processor. Approval data from the central facility is transmitted directly to the receiver processor using this third communication link.

In this embodiment, the communication device belonging to the consumer does not communicate directly to the central facility in order to request payment approval. Payment approval for the transaction is based on payment data received at the receiver processor, forwarded to the retailer processor and then from the retailer processor to the central facility. Payment approval or decline data is transmitted by the central facility directly to both the retailer processor and to the receiver processor via the second and third communication links respectively. An advantage of such a system is that the consumer does not need to connect to the

central facility in order to obtain payment approval which can improve the speed for processing the payment approval.

Further, an indication of payment approval is sent directly to the receiver processor at the point of sale by the central facility. An advantage of sending approval directly from the central facility to the receiver processor is mitigation of transmission congestion risks for payment approval. For example, several retail outlets, each having at least one receiver processor, may be connected to a single retailer processor as illustrated in Figure 2B of the specification. In such implementations congestion of approval data could occur at the retailer processor if all approval data was to be transmitted via the retailer processor. However, in the system as claimed, approval data is transmitted directly to the receiver processor such that the EPOS terminal is provided with an immediate indication of whether the transaction has been approved or declined. Thus, any congestion or delay that may be caused by a large number of transactions having to be processed and forwarded to the relevant receiver processor by the retailer processor is avoided. It should be appreciated that although payment approval data is transmitted by the central facility to the retailer processor, this data is used for transaction tracking and reconciliation purposes rather than for point of sale transaction approval to enable the customer to receive their goods. The central facility sending an approval indication directly to the receiver processor may reduce waiting time at the physical point of sale for transaction approval. Reduction of transaction approval delays can improve the throughput speed at checkouts which can improve customer satisfaction.

#### Embodiment 2

Embodiment 2 enables a customer to order and pay for goods remotely, using a communication device, for collection from a retail outlet. In this embodiment the payment transaction can be initiated and approved remotely from the retail outlet and the retail outlet provided with an approval code that can be matched to an approval code presented by a customer to enable the customer to receive the goods or services. This embodiment is shown in Figure 3 and described in paragraphs 90 to 97 and defined in claims 25 and 51.

**Amended Claim 25**

Independent claim 25 has been amended based on the disclosure in Figure 3 and paragraphs 90 to 97. Independent claim 51 is a new independent method claim based on amended claim 25.

Independent claim 25 defines:

*A payment transaction system comprising:*

*a central facility having a payment approval processor and a transaction payment database, the database maintaining accounts relating to respective consumers, and the payment approval processor being adapted to interrogate the database and determine whether a payment is to be approved based on the status of the consumers account, as maintained in the database, and in response to the central facility receiving payment data from a communication device belonging to a consumer, and if payment is to be approved transmitting an approval code back to the communication device;*

*at least one receiver processor located at a retail outlet for receiving an approval signal including the approval code from the central facility, the receiver processor including a store back office server having a payment application processor and a store database, the store database being for storing the approval payment details including the approval code, and an EPOS terminal for receiving from the payment application processor the approval code and storing the approval code, so that when the consumer presents at the EPOS terminal to collect goods or services paid for, the approval code transmitted to the user's communication device and the stored approval code at the EPOS terminal are matched to confirm payment;*

*a first communication link for data communication between the central facility and each receiver processor;*

*a retail processor including a payment database, the retail processor receiving from the store back office server approval payment details and storing completed payment transaction details to enable completed payment transaction details to be matched to payments approved by the central facility; and*

*a second communication link for connecting the store back office server with the retailer processor.*

**New Claim 51**

Independent claim 51 defines:

*A payment transaction method comprising:*

- a. *receiving payment data from a communication device belonging to a consumer by a central facility having a payment approval processor and a transaction payment database wherein accounts relating to respective consumers are maintained;*
- b. *interrogating the transaction payment database by the payment approval processor;*
- c. *determining by the payment approval processor whether the payment is to be approved based on the status of the consumer's account, as maintained in the database;*
- d. *transmitting an approval code back to the communication device by the central facility, and if payment is approved;*
- e. *providing the approval code by the central facility to a receiver processor located at a retail outlet, the receiver processor including an EPOS terminal, a store back office server having a payment application processor and a store database;*
- f. *receiving the approval code by the payment application processor of the receiver processor via a first communication link for connecting the central facility with the receiver processor;*
- g. *storing approved payment data and approval code in the store database;*
- h. *providing the approval code to the EPOS terminal by the payment application processor when the consumer presents to collect goods or services paid for;*
- i. *matching the approval code transmitted to the user's communication device and the stored approval code by the EPOS terminal to confirm payment; and*
- j. *matching confirmed payments and stored payment transaction details with payment approval data of the central facility by a retailer processor including a payment database for receiving the store back office server approval payment details.*

**Dependent Claims 26-28 and 52-54**

Dependent claims 26-28 are appended to claim 25 and add limitations of preferred embodiments. Dependent claims 52-54 are appended to claim 51 and add limitations of preferred embodiments.

In this embodiment, the payment transaction is initiated by the central facility receiving payment data from a communication device belonging to a customer. If payment is to be approved, an approval code is transmitted back to the communication device and also to a receiver data processing system located at a retail outlet. On matching of the approval code on the communication device with the approval code in the receiver processor at the retail outlet, payment is confirmed and the consumer can be provided with their goods and services. Once payment is confirmed in this manner the completed payment transaction details are provided to the retailer processor.

Again, in this embodiment the retailer's system includes one or more receiver processors and the central data processing system communicates directly with the receiver processors at the retail outlet. It should be appreciated that the advantages of this method include minimizing the need for relaying data via a retailer processor to provide approval data to the point of sale receiver processor. Further, only data for confirmed transactions, where the transaction has been completed by the customer receiving the goods or services, is transmitted to the retailer processor for matching completed transactions to approved payments. This has an advantage of minimizing data traffic of the retailer processor.

The disclosures of the cited prior art documents, whether considered individually or in combination, do not teach or suggest a combination of features of the invention as claimed in any of the independent claims.

***Drawings***

The drawings are objected to because they include the reference character 220 in Fig. 3 and that number is not mentioned in the description.

An appropriate amendment to the specification has been made.

***Claim Objections***

Claims 1, 25 and 29 and are objected to because of the following informalities:

Claims 1 and 29:

Claims 1 and 29 are objected to because the Examiner asserts that "authorised" and "authorising" have been misspelled. Appropriate correction has been made or the claim cancelled.

Claim 25:

Claim 25 as submitted begins with a lower case "a". Appropriate correction has been made.

*Claim Rejections – 35 USC § 112*

**Claim 39 rejected under 35 U.S.C. 112, second paragraph, as being indefinite.** This rejection is moot in view of the cancellation of the claim.

*Claim Rejections – 35 USC § 102*

**Claims 1-2, 4, 13-14, 29-30, 32-33, 35, 40-41 are rejected under 35 U.S.C. 102(b) as being anticipated by US Patent No. 6,289,322 B1 by Kitchen et al. (Kit).** This rejection is traversed for at least the following reasons.

First, as to claims 1, 2, 4, 13, 14, 30, 32, 33, 35, 40 and 41, the rejection is moot in view of the cancellation of the claims.

Second, as to claim 29 and the remaining independent claims, the rejection based on anticipation by Kit is overcome by the amendment to the claims.

Claims 17, 25, 29 and 51

**US 6,289,322 Kitchen (Kit)** is directed to an internet based system for consolidating bills from various billers and facilitating payments. The system of Kit provides a centralized bill processing system, CF station 140, which is linked via a network to financial institutions, billers and payors. The system of Kit provides services for facilitating bill payments over the internet. Bills are always generated by billers and sent to payors either directly or via the CF station.

There is no disclosure or suggestion in Kit of the systems and methods of the present invention as claimed in any one of claims 17, 25, 29 or 51. There is no disclosure in Kit of a receiver processor located at a retail outlet for receiving payment details from a user's

communication device. Kit does not disclose any retailer's system or electronic point of sale type transactions or equipment. There is no disclosure or suggestion in Kit of the described system even being employed in a face-to-face retail context.

Applicants therefore submit that Kit does not disclose the invention as claimed in any one of independent claims 17, 25, 29 or 51, or their appended claims.

*Claim Rejections - 35 USC § 103*

**Claims 3, 5-6, 15, 31, 34 and 42-43 are rejected under 35 U.S.C. 103(a) as being unpatentable over US Patent No. 6,289,322 B1 by Kitchen et al. (Kit) as applied to claims 1-2 above with respect to claims 3, 5-6; as applied to claims 29 above with respect to claim 31, as applied to claims 29 and 33 above with respect to claim 34; as applied to claims 29 and 41 above with respect to claims 42-43 and further in view of US Pub No. 2002/0077978 A1 by O'Leary et al. (Lear).** This rejection is moot due to the cancellation of the rejected claims.

**Claims 17, 25, 29 and 51**

As to these new or amended independent claims, the patent to Kit was discussed above.

**US 2002/0077978 O'Leary (Lear)** is directed to a method and system for making payments using electronic funds transfer (EFT) transactions where payments are "pushed" to a merchant to avoid having to send credit card details via the internet for on-line purchases to enable a merchant to "pull" funds from the buyer's account. The disclosure of Lear describes electronic wallet, transaction accounts, account reporting and web broker services to enable EFT "push" payments to be made. All of these services are managed by or on behalf of financial institutions and provide web page based portals for customers and merchants to view their accounts and perform transactions (For example, see paragraph 52-61, 72, 87 and Figure 2).

In contrast embodiments of the present invention are concerned with systems and methods for approving retail transactions, in particular face-to-face retail transactions, rather than a funds transfer process. In embodiments of the present invention, payment data is provided from a communication device to a central facility (either directly or through a retailer's system) to request payment approval from the central facility. The approval gives assurance of payment for the goods to the retailer (see paragraph 81). The central facility pays the retailer at the agreed terms and conditions to complete the full transaction (see paragraph 84). Thus, the retailer

collects payment for approved transactions from the central facility in a “pull” type payment transaction, to use the terminology of Lear.

The system of Lear is directed to on-line shopping rather than face-to-face retail transactions. The only disclosure of the system of Lear being used in a face to face transaction is described in paragraphs 106 to 113 with reference to Figure 4, where a user can be issued with a physical card associated with a VPL or IPA account. In paragraph 112 it is described that the physical card can be inserted into a card reader at a point of sale location. There is no disclosure or suggestion in Lear of a user making a payment using their communication device at a retail outlet.

There is no disclosure or suggestion in Lear of a retailer having a receiver processor as claimed for receiving payment data from a user's communication device, transmitting payment data via a first communication link to a retailer processor, transmitting payment data by the retailer processor to a central facility by a second communication link and transmitting an approval indication from the central facility to the receiver processor to enable the user to receive the goods and services as claimed in claim 17 and 29.

Further there is no disclosure or suggestion in Lear of a user being provided with an approval code, for purchase of goods or services, which is transmitted from a central facility to their communication device for matching with an approval code transmitted to a receiver processor when the user presents at an EPOS terminal at a retail outlet to receive the goods or services as claimed in claim 25 and 51.

Lear does not disclose or suggest the invention as claimed in any one of independent claims 17, 25, 29 or 51, or their appended claims.

Lear does not disclose the invention as claimed. Further, the invention as claimed cannot be derived from a combination of the disclosure of Kit and Lear.

A skilled person could not combine the disclosure of Kit and Lear to derive the invention as claimed. Neither Kit nor Lear disclose or suggest using a communication device for payment transactions in a face-to-face retail context. Neither Kit nor Lear disclose or suggest any system architecture comprising receiver processors, retailer processor, central facility and communication links there between as claimed in any one of claims 17, 25, 29 or 51.

The only possible logical combination of the disclosure of Kit and Lear that could be derived at by a skilled person without exercising any inventive ingenuity would be use of the EFT “push” payment system of Lear in combination with an on-line bill consolidation and payment interface of Kit.

Applicants therefore submit that the invention as claimed is novel and inventive in light of the disclosure of Kit and Lear.

**Claims 7-9 and 12 are rejected under 35 U.S.C. 103(a) as being unpatentable over US Patent No. 6,289,322 B1 by Kitchen et al. (Kit) in view of US Pub No. 2002/0077978 A1 by O'Leary et al. (Lear), as applied to claims 1-2, 5-6 above with respect to claims 1-9; as applied to claims 1-3 above with respect to claim 12, and further in view of US Patent No. 6934664 B1 by Webb et al. (Web).** This rejection is moot in view of the cancellation of the rejected claims.

**Claims 17, 25, 29 and 51**

With regard to the new and amended independent claims, the invention clearly is patentable over the combination of cited art for the reasons already given and for the following reasons.

**US 6,934,664 Webb (Webb)** discloses using a user device such as a PDA for transmitting encrypted payment and identification information to a point of sale device. The disclosure in Webb is directed to monitoring a security state of the PDA and inhibiting or allowing transactions based on the security state. The disclosure in Webb is not concerned with the architecture of the retailer's system beyond the provision of a point of sale device (POS) adapted to communicate with the PDA. Webb does not disclose details of the approval process for transactions or details of the architecture of the retailer and financial systems used to process the transaction.

Webb therefore cannot overcome the deficiencies of Lear and Kit to derive the present invention as claimed in any of the independent claims or their dependent claims.

Lear teaches a financial transaction system where a customer does not need to transmit payment details to a retailer. In the system of Lear an EFT payment is “pushed” to a retailer's account by a web broker to avoid the need for a customer to transmit their account details via the

internet. Lear and Webb both address the same problem, that of improving security for a user's banking information but Lear and Webb both apply completely different solutions. Webb enhances information security through encryption and device monitoring, whereas Lear provides a system that removes the need to transmit banking details. Thus the two divergent solutions teach away from each other and any combination of the two documents.

Kit is directed to an online billing system therefore is illogical to combine with any retail point of sale type transaction system. Even if a skilled person was to combine the disclosure of Kit, Lear and Web the system and method as claimed in the present application could not be derived without applying inventive ingenuity or hindsight of the present invention.

**Claims 10 and 37 are rejected under 35 U.S.C. 103(a) as being unpatentable over US Patent No. 6,289,322 B1 by Kitchen et al. (Kit) in view of US Pub No. 2002/0077978 A1 by O'Leary et al. (Lear), as applied to claims 1-3 above with respect to claim 10, as applied to claim 37 with respect to claim 37 and further in view of US Patent No. 5870725 by Bellinger et al. (Bell).** This rejection is traversed for at least the following reasons.

First, in reference to Claim 10, the rejection is moot in view of the cancellation of the claim.

Second, with regard to claim 37, the claim is patentable over the cited combination of references because of its dependence from claim 29.

Claim 29

**US 5,870,725 Bellinger (Bell)** discloses an automated system for scanning, processing and storing data from physical financial documents (checks) and enabling searching on this data for following up financial transactions. There is no disclosure in Bell of any retail electronic payment system. The invention of Bell is directed to enabling easier handling of processing of physical checks and therefore is not relevant to the invention claimed or the problem of improving processing of electronic transactions. Bell teaches of using physical checks for payment and therefore teaches away from a system which enables use of electronic payments.

There is no disclosure in Bell of a device for communicating with a user's communication device for reading payment data from the device. All payment data discussed in Bell is read from physical checks.

Bell, therefore cannot overcome the deficiencies of Kit and Lear to derive the present invention as claimed.

**Claims 11 and 38 are rejected under 35 U.S.C. 103(a) as being unpatentable over US Patent No. 6,289,322 B1 by Kitchen et al. (Kit) in view of US Pub No. 2002/0077978 A1 by O'Leary et al. (Lear), as applied to claims 1-3 above with respect to claim 11; as applied to claim 29 with respect to claim 38, and further in view of US Patent No. 6175922 B1 by Wang (Wang).** This rejection is moot in view of the cancellation of the rejected claims.

**Claims 17, 25, 29 and 51**

As to the pending independent claims, Wang does nor remedy the deficiencies of the previously discussed prior art.

**US 6175, 922 Wang (Wang)** is directed to a device for executing a transaction program to generate an encrypted authorization and identification data in response to a user approving a transaction. There is no disclosure or suggestion in Wang of the invention as claimed in the present application. Similarly to Webb this invention relates to identification and authorization of the user not the architecture of a payment transaction system.

The system of Wang teaches encryption and security of transmitted data and therefore teaches away from the system of Lear, which aims to minimize the amount of financial data that is required to be transmitted for on-line retail transactions by utilizing EFT "push" payments to retailers.

The only logical combination of the system of Kit and Wang would be to use the device of Wang for identification/authorization of a user of the online billing system of Kit. A combination of the disclosure of Lear Kit and Wang could not derive a retail payment transaction system as claimed in the present application.

**Claims 16 and 36 are rejected under 35 U.S.C. 103(a) as being unpatentable over US Patent No. 6,289,322 B1 by Kitchen et al. (Kit) as applied to claim 1 above with respect to**

**claim 16; as applied to claims 29, 33-34 with respect to claim 36.** This rejection is moot in view of the cancellation of the rejected claims..

**Claims 17-18, 23-27 are rejected under 35 U.S.C. 103(a) as being unpatentable over US Pub No. 2002/0077978 A1 by O'Leary et al. (Lear).** This rejection is traversed for at least the following reasons.

**Claims 17 and 25**

The distinction of these claims over Lear alone or in combination with other art already has been identified.

**Claims 18, 23, 24, 26 and 27**

These claims would be patentable over Lear because of their dependence from claim 17 or 25.

**Claims 19 are rejected under 35 U.S.C. 103(a) as being unpatentable over US Pub No. 2002/0077978 A1 by O'Leary et al. (Lear) as applied to claims 17-18 above, and further in view of US Pub. No. 2003/0171993 A1 by Chappuis (Chap)** This rejection is traversed for at least the following reasons.

The distinction over Lear already has been given. Chap does not remedy the identified deficiencies.

**US 2003/0171993 Chappuis (Chap)** discloses a system whereby credit card details can be sent to a data processing centre using a mobile phone to make a payment. Chap discloses the use of SMS, however there is no disclosure or suggestion in Chap of a retailer payment transaction system as claimed.

The Examiner cites Chap in combination with Lear, however the invention of Chap transmits credit card details to a data processing centre by SMS to enable the payment transaction to be completed. This teaches away from the solution of Lear which avoids the need to transmit credit card details by “pushing” EFT payments to merchants. Thus a skilled person would not logically combine the disclosure of Lear and Chap.

**Claims 20, 22, 28 are rejected under 35 U.S.C. 103(a) as being unpatentable over US Pub No. 2002/0077978 A1 by O'Leary et al. (Lear) as applied to claims 17 above, and further in view of US Patent No. 6,289,322 B1 by Kitchen et al. (Kit).** This rejection is traversed for at least the following reasons.

These claims depend upon allowable independent claims and would be patentable for the reasons given for those claims.

**Claim 21 rejected under 35 U.S.C. 103(a) as being unpatentable over US Pub No. 2002/0077978 A1 by O'Leary et al. (Lear), as applied to claim 17 above, and further in view of US Patent No. 5870725 by Bellinger et al. (Bell).** This rejection is traversed for at least the following reasons.

This claim depends upon allowable independent claim 17 and would be patentable for the reasons given for that claim.

**Claim 39 is rejected under 35 U.S.C. 103(a) as being unpatentable over US Patent No. 6,289,322 B1 by Kitchen et al. (Kit), as applied to claim 29 above and further in view of in view of US Pub No. 2002/0077978 A1 by O'Leary et al. (Lear) and in view of US Patent No. 6934664 B1 by Webb et al. (Web).** This rejection is moot in view of the cancellation of the rejected claim.

#### *Conclusion*

The invention as claimed in independent claims 17, 25, 29 and 51, and their dependent claims is not disclosed in any of the cited documents, either along or in combination. Further, the invention cannot be derived from the cited documents by a skilled person with application of inventive ingenuity.

Applicants therefore submit that the invention as claimed in the new or amended claims is novel and inventive.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

*/Alan J. Kasper/*

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

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Alan J. Kasper  
Registration No. 25,426

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